



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

24 September 2003

Mr. Fred Evans, Remedial Project Manager
US Department of the Navy
Engineering Field Activity Northeast
Naval Facilities Engineering Command
10 Industrial Highway
Lester, PA 19113-2090

RE: QAPP for Additional Sediment Sampling and Characterization
For Phase II Remedial Investigation IR Program Site 16
(Former Creosote Dip Tank and Fire Fighting Training Area)
Naval Construction Battalion Center
Davisville, Rhode Island
Submitted 13 August 2003, Dated August 2003

Dear Mr. Evans;

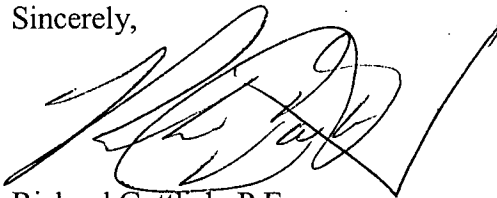
The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the above referenced document and comments are presented below:

1. Page 5-1, Section 5.2, Previous Investigations; Based on three sediment and three seep water samples taken during the Phase I screening ecological risk assessment the Navy is proposing to limit this investigation to eight inorganics, ten PAH, nine pesticides/PCB, and one VOC. Not enough samples have been taken to start screening out potential contaminants of concern. Of particular interest to RIDEM is VOC in the sediment as this can have an adverse impact on shellfish. Given the historic use of pesticides by the military arsenic should also be quantified. In accordance with Section 8.01 of the RIDEM Remediation Regulations contaminants of concern cannot be screen out until it is shown that each contaminate of concern individually and cumulatively does not pose a risk. Therefore, RIDEM requires that the full suite of compounds be sampled for.
2. Table 7-1; The project action limits for aluminum and iron are stated as 18,000 and 22,000 mg/kg, respectively. Section 8.07(D) of the RIDEM Remediation Regulations does not allow for the concentration of any hazardous substance in soil to exceed 10,000 mg/kg. Therefore, the project action limits for these analytes must be reduced to at most 10,000 mg/kg.

3. Page 8-2, Reference Sample Locations; Please explain the basis for the reference locations chosen in terms of similarity to the site under study, representativeness of background concentrations, tidal influence, depth of water, depositional characteristics, etc. In the case of Little Allen Harbor being easily accessible does not justify its use as a background location. Little Allen Harbor could be more contaminated than Allen Harbor.
4. Page 8-2, Reference Sample Locations; It is stated that 5 sediment samples will be taken from each reference location. Please state where within these reference locations the samples will be taken from. In addition, for each sample location a shallow (0-1') and deep (1' - 4') sample will be required to understand the spatial relationship of contamination relative to the site under investigation. Exact depth for shallow and deep can be determined by taking a core and sampling the dirtiest portion of the core.
5. Page 16-1, Section 16 (Assessments and Response Actions), Paragraph 2; Please note that under its State authority RIDEM can issue a cease and desist order if it is found that work being performed is inconsistent with RIDEM Rules and Regulations or is adversely affecting the environment.

RIDEM looks forward to working with the Navy and USEPA on the completion of these documents. If you have any questions or require additional information please call me at (401) 222-2797 ext. 7138 or e-mail me at rgottlieb@dem.state.ri.us.

Sincerely,



Richard Gottlieb, P.E.
Principal Engineer

Cc: M. DeStefano, DEM OWM
C. Williams, EPA Region 1
S. King, RIEDC
S. Licardi, ToNK
J. Shultz, EA Eng.